REMARKS

Claims 1, 10, 16, and 21 have been amended to more particularly point out and distinguish Applicant's claimed invention from Faccin and Daly. Reexamination of this application in light of the following comments is therefore respectfully requested.

Applicant's invention relates to a method that allows a dual mode mobile station to receive broadcast teleservice messages originating from a Broadcast Message Center in a circuit-switched network while camping on a control channel of a packet-switched network. An interworking function receives broadcast teleservice messages from the Broadcast Message Center in the circuit-switched network, and translates the messages from a first messaging protocol used in the circuit-switched network to a second messaging protocol used in the packet-switched network. The translation function performed by the interworking function should be distinguished from tunneling or encapsulation. Tunneling or encapsulation is a technique which enables a network to send data utilizing one protocol through another network using a different protocol. It does so by encapsulating packets using one network protocol within packets being transmitted through the other network. With tunneling, the encapsulated message is not altered but simply wrapped up inside of another message. After unwrapping, the original message is recovered at the receiver. Thus, when viewed from end to end, there is no conversion or translation from one protocol to another.

In contrast to tunneling or encapsulation, the present invention translates or converts messages from one protocol to another protocol. In the particular embodiment disclosed, the interworking function converts BATS messages to PTM-M messages. The conversion includes mapping broadcast categories in the BATS message to corresponding IMGIs in PTM-M messages. When viewed end to end, the message received at the destination is formatted according to a different protocol than the originally-transmitted message.

The claims have been amended to distinguish the claimed invention from networks that employ tunneling or encapsulation to deliver messages across diverse networks. The claims as

originally filed recited a formatter to format broadcast teleservice messages according to a second messaging protocol for delivery over the packet-switched network. Broadly construed, the term "format" could be read to cover encapsulation or tunneling where the original message is inserted inside of another message. The amended claims recite the step or function of translating messages from a first protocol into a second protocol to make clear that the interworking function according to the present invention performs protocol conversion. The amended language is intended to distinguish the present invention from simple encapsulation or tunneling without protocol conversion.

The prior art made of record by the Examiner does not teach or suggest the invention which is the subject matter of the amended claims. First, neither Faccin nor Daly discuss methods of delivering broadcast teleservice messages across diverse networks, which is the object of the present invention. The Faccin article is nothing more than an overview of the GPRS network and describes in general terms only how a GPRS network can be integrated with a GSM or IS-136 network. There is no discussion of broadcast teleservices or how to deliver broadcast teleservices across networks.

The Daly patent discusses how to deliver a point-to-point message, as distinguished from a broadcast message, originating in one network to a mobile station in a different network. More particularly, Daly discusses how to deliver a point-to-point message originating in the packet-switched network to a mobile station in the circuit-switched network. Note that the direction of transmission is in the opposite direction than the claimed invention. As described in Daly, the data message is sent to a teleservice center in the circuit-switched network which encapsulates the data message inside an R-DATA teleservice message for delivery to a mobile station. Daly does not teach an interworking function that performs protocol conversion as required by the claims.

For the foregoing reasons, it is respectfully urged that the claims as now amended define over the prior art made of record by the Examiner. Applicant notes that claim 10 has also been amended to correct the informality noted by the Examiner.

Respectfully submitted,

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Dated: April 29, 2005

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